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July 6, 2022

**VIA ECF**

The Honorable John G. Koeltl  
United States District Judge  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

RE: *National Gen. Ins. Co. v. Radoncic, et al*  
Case No.: 20-CV-03876-JGK-GWG

Dear Judge Koeltl:

This firm represents the plaintiff, National General Insurance Company ("NGIC"), in the above-captioned lawsuit. This correspondence, requesting a stay of proceedings and/or referral for mediation and a stay of deadlines pending its outcome, is submitted jointly by the parties appearing herein.

Respectfully, the parties jointly request a stay of those further proceedings prescribed in Your Honor's Order of June 8, 2022, in conjunction with a referral to Magistrate Judge Gorenstein to allow for global mediation between all stakeholders to this action, the underlying tort action, and a companion E&O action brought by the Radoncic defendants against their broker. It is requested that the remaining trial deadlines set in Your Honor's Order of June 8, 2022, be stayed until the Magistrate determines the parties have either settled or reached an impasse. It is further respectfully requested that such mediation be ordered to take place before August 19, 2022, the date upon which the summary judgment motion in the underlying tort action is returnable.

Respectfully, the parties agree that this is an efficacious opportunity to attempt a global settlement, given the Court's recent ruling on the parties' cross-summary judgment motions, the pending motion for summary judgment in the underlying state tort action, and the stay of proceedings in the broker state court action pending resolution of this action. Given the status of these proceedings, we believe that valuable judicial resources can be preserved in pursuit of potential global resolution.





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Thank you for the Court's consideration.

Respectfully submitted,

HURWITZ FINE P.C.



Ryan P. Maxwell

cc: All Parties *via ECF*

